TOWNSEND

and

TOWNSEND

and

Crew

June 20, 2007

Palo Alto

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VIA EMAIL

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Re: Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC v. Baxter International Inc. and Baxter Healthcare Corporation and related counterclaim U.S. District Court, District of Delaware, Case No. 05-349-GMS Our Reference 018652-004000

## Dear Counsel:

Per our agreement to identify those witnesses we expect to call live at trial, following are the witnesses Baxter expects to call live at trial:

- 1. William Alonso, Ph.D.
- 2. Christophe Carnewal
- 3. James A. Giblin, if he becomes available
- 4. Edward G. Gomperts, M.D.
- 5. Lawrence Guiheen and/or Ron Lloyd
- 6. Gerhard Pölsler, Ph.D.
- 7. Clara Schreiner, Ph.D.
- 8. Wolfgang Teschner, Ph.D.
- 9. R. Bruce Den Uyl
- 10. Thomas Kindt, Ph.D.
- 11. Terence Snape, Ph.D.

Very truly yours,

TOWNSEND AND TOWNSEND AND CREW LLP

Annie M. Rogaski

AMR:lp 61079108 v1

cc: Philip A. Rovner, Potter Anderson & Corroon LLP (via email)
Bradford J. Badke, Ropes & Gray LLP (via email)

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